SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT RULE 1150.1

FOURTH QUARTER 2004 MONITORING REPORT BRADLEY LANDFILL AND RECYCLING CENTER SUN VALLEY, CALIFORNIA

Prepared for

Waste Management of California, Inc.

Bradley Landfill and Recycling Center

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Abbreviations

CARB	California Air Resources Board
FID	Flame Ionization Detector
GEM-500	CES-LANDTEC Gas Extraction Monitor
LFG	Landfill Gas
OVA	Organic Vapor Analyzer
PPB	Parts per Billion
PPM	Parts per Million
SCAQMD	South Coast Air Quality Management District
TGNMO	Total Gaseous Non-methane Organic Compounds
TOC	Total Organic Compounds

1 EXECUTIVE SUMMARY

This fourth quarter report for the year 2004 summarizes the monitoring and sampling results at the Bradley Landfill and Recycling Center (BLRC) for compliance with South Coast Air Quality Management District (SCAQMD) Rule 1150.1(f)(2)(B) and pursuant to the conditions set forth in the Alternative Rule 1150.1 Compliance Plan (SCAQMD A/N 394147) approved by SCAQMD on June 19, 2002. The Compliance Plan is found in Appendix A.

1.1 Site Description and Background

The Bradley Landfill and Recycling Center (BLRC) is located in the Sun Valley District of Los Angeles, California, in the northwest portion of the Los Angeles metropolitan area. The landfill is owned and operated by Waste Management Recycling and Disposal Services of California, Inc. (WMRDSC, formerly Valley Reclamation Company). The site was previously utilized as a sand and gravel pit by Conrock Company. Waste Management of Los Angeles Hauling Company also operates on the BLRC property. The landfill is a Class III waste disposal facility occupying approximately 209 acres. A site map containing the current landfill boundary and locations of landfill gas (LFG) extraction wells is presented as Figure 1.

An active LFG migration/emissions control system has been in operation at the site since 1982. During normal operation, the higher BTU value LFG is processed through the gas treatment plant and delivered to one (1) on-site and one (1) offsite LFG-to-energy facility. Stewart and Stevenson (S&S) currently operates the on-site facility under contract by Waste Management, Inc. The off-site facility is owned by Penrose Landfill Gas Conversion, LLC, formerly owned by 8309 Tujunga Avenue Corporation and operated by Covanta Power Pacific, Inc. The on-site facility operated by S&S was placed into service on March 3, 2003. The lower BTU value gas (under 500 BTU/cf) collected from the Bradley east and the Bradley west perimeter is disposed of through the BLRC flare stations. When the higher BTU value LFG is not in demand by either of the LFG-to-energy facilities, the gas is routed to one of the on-site flare stations where it is combusted in accordance with SCAQMD rules and permit conditions.

1.2 Gas Collection and Disposal System

The BLRC LFG collection and disposal system consists of the LFG Compressor Plant, the gas condensate collection system, three (3) LFG flaring systems, a LFG collection system and five (5) LFG to energy systems. The LFG collection series consist of header collection pipes, laterals, vertical extraction wells and horizontal collectors. Presently, the system has 117 vertical dual completion wells and 109 single completion vertical wells for a total of 226 wells. In addition, the system has 13 horizontal collectors.

Condensate currently drains by gravity to 18 collection sumps where it is pumped to the LFG treatment plant for processing. When the condensate destruction system is not in use, condensate is passed through the phase separator where the aqueous phase is removed and the hydrocarbon phase is stored. The aqueous phase is pH-adjusted before being discharged to the City of Los Angeles sanitary sewer system. As the hydrocarbon phase is accumulated, it is transferred to the larger hydrocarbon storage tank where it accumulates until transported off-site in accordance with all applicable regulations.

1.3 Monitoring and Sampling Activities Summary

Field activities performed by EMCON/OWT Solid Waste Services (EMCON/OWT) during this quarter included:

- Monthly subsurface perimeter probe monitoring (as required by the Local Enforcement Agency)
- Quarterly integrated surface emission monitoring and sampling for laboratory analysis
- Quarterly instantaneous surface emission monitoring
- Quarterly flare inlet LFG sampling for laboratory analysis
- Quarterly ambient air monitoring (24-hour)
- SCAQMD Rule 431.1 Sulfur Monitoring

AtmAA, Inc. performed the laboratory analysis for four (4) integrated surface emission samples, flare inlet LFG samples, ambient air sample(s), and monthly perimeter probe sample from the probe with the highest field-obtained TOC as methane concentration. The integrated surface samples were analyzed for toxic air contaminants (Toxic Air Contaminants--Core Group, Guidelines for Implementation of Rule 1150.1, Table 1), methane, and total gaseous non-methane organic compounds (TGNMOs) as stipulated by SCAQMD's Rule 1150.1. The flare inlet LFG samples were analyzed for the

concentration of fixed gases, hydrogen sulfide, and toxic air contaminants. The ambient air samples were analyzed for toxic air contaminants, methane, and total gaseous non-methane organic compounds (TGNMOs). Toxic air contaminants were analyzed by gas chromatograph/mass spectrometry consistent with Environmental Protection Agency (EPA) Method TO-15. Fixed gases were analyzed by gas chromatograph/thermal conductivity detector using EPA Method 3C Modified. Total gaseous non-methane organics (TGNMOs) were analyzed using modified EPA Method 25C with gas chromatograph/flame ionization detection/total combustion analysis. A gas chromatograph/sulfur chemiluminescence detector was used to analyze for hydrogen sulfide per SCAQMD Rule 431.1 and the Rule 431.1 Alternative Monitoring Plan (A/N 267044), and analyzed using SCAQMD Method 307-91.

1.3.1 Subsurface Perimeter Probe Monitoring §1150.1(e)(1)

Monthly subsurface perimeter probe monitoring was performed using a Landtec GEM-2000 LFG monitor during the quarter. Perimeter probes were monitored for percent methane by volume in air.

Alternative monitoring procedures are used in the area of perimeter probe E-8D, including monitoring of the probe and performing surface emission monitoring of Grid 31-D, as specified in the Rule 1150.1 Compliance Plan for Bradley Landfill. These alternative monitoring procedures are implemented when TOC as methane concentrations meet or exceed five (5) percent by volume, measured as methane. Results did not exceed 5 percent methane in any perimeter probe except for Probe E-8D (exempt). Field and laboratory data from subsurface perimeter probe monitoring and laboratory TOC concentrations as methane are discussed in Section 2.2 and presented in Appendix B. Samples from the probe with the highest field-obtained TOC as methane concentrations are sent to AtmAA Inc. for laboratory analysis.

1.3.2 Integrated Surface Emission Monitoring §1150.1(e)(2)

The TOC as methane concentration collected from each grid is listed in Table 3-1, Integrated Surface Sampling Field Summary. Field data sheets are presented in Appendix C. All of the integrated TOC as methane readings were within compliance limits, as set forth by SCAQMD Rule 1150.1. Typically, the two samples having the highest field TOC as methane concentrations are sent to the laboratory for further analysis. The TOC as methane background reading was 5.0 ppm. During surface emissions monitoring, TOC as methane concentrations above background were no more than 3 ppm. Samples from Grids 111 and 112 were selected for laboratory analysis.

RES Environmental obtained samples from Grids 111 and 112 and submitted them for laboratory analysis for methane, TGNMOs, and Toxic Air Contaminants.

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Laboratory analysis of the samples collected from Grid 111 detected low-level concentrations (less than 5 parts per billion [ppb]) of the following constituents: benzene, dichloromethane, carbon tetrachloride, toluene, and xylenes. Laboratory analysis of the samples collected from Grid 111 detected concentrations of methane at 39.9 parts per million [ppm]. Laboratory analysis of the samples collected from Grid 111 detected low-level concentrations (less than 5 ppm) of TGNMO.

Laboratory analysis of the samples collected from Grid 112 detected low-level concentrations (less than 5 ppb) of the following constituents: benzene, dichloromethane, carbon tetrachloride, toluene, and xylenes. Laboratory analysis of the samples collected from Grid 112 detected concentrations of methane at 16.2 ppm. Laboratory analysis of the samples collected from Grid 112 detected low-level concentrations of TGNMO (less 5 ppm) of methane. The laboratory reports are presented in Appendix C.

1.3.3 Instantaneous Surface Emission Monitoring §1150.1(e)(3)

Instantaneous surface emission monitoring was conducted on October 19, November 23, and December 21, 2004, and consisted of monitoring the landfill surface for the presence of LFG emissions. Total organic compound (TOC) measurements (measured in ppm as methane) were recorded in accordance with procedures described in the SCAQMD Guidelines for Implementation of Rule 1150.1. Areas of the landfill where TOC as methane concentrations were greater than 500 ppm TOC as methane were remonitored within 10 calendar days of the original detection. Instantaneous surface emission monitoring field data are presented in Appendix D.

In accordance with Rule 1150.1(e)(2)(C), WMRDSC determined that new wells were needed to address surface emission exceedences that occurred during the Third Quarter 2004 instantaneous monitoring. Construction of the wells were completed during the fourth quarter of 2004 between November 1 and November 9, 2004. Wells P-15R, P-20R, P-36R, and P-19R were installed.

In October 2004, instantaneous monitoring of Grids 111, 112, 123, 124 and 131 had detected concentrations of 100,000, 100,000, 1,000, 500, and 500 ppm TOC as methane, respectively. These areas were repaired on October 19, 2004 and 10-day remonitoring occurred on October 29, 2004. Grids 111, 124, 131 were remonitored and had concentrations less than 500 ppm. The remonitoring concentrations for Grids 111, 124, and 131 were 6, 20, and 5 ppm TOC as methane, respectively. Grids 112 and 123 were remonitored and had detected concentrations of 500 and 1,000 ppm, respectively. The areas were repaired on October 29, 2004 and a second 10-day remonitoring occurred on November 8, 2004.

The remonitoring concentrations for Grids 112 and 123 were 5 and 5 ppm TOC as methane, respectively.

In November 2004, instantaneous monitoring of Grids 111, 112, and 131 had detected concentrations of 3,000, 3000, and 1,000 TOC as methane. These areas were repaired on November 23, 2004 and 10-day remonitoring occurred on November 23, 2004. All remonitoring concentrations for Grids 111, 112, and 131 had concentrations less than 500 ppm. The remonitored concentrations for Grids 111, 112, and 131 were 20, 20, and 10 TOC as methane, respectively.

In December 2004, instantaneous monitoring of Grids 23, 68, 93, 111, 112, 120, 124, and 131 detected concentrations of 1,000, 600, 1,000, 10,000, 10,000, 100,000, 1,000, and 10,000 ppm TOC as methane, respectively. Grids 23, 68, 93, 111, 112, 120, 124, and 131 were repaired and 10-day remonitoring occurred on December 21, 2004. All remonitored areas had concentrations less than 500 ppm. The remonitored concentrations were 100, 100, 300, 300, 200, 100, and 300 ppm TOC as methane, respectively.

Additional discussion pertaining to the grids is discussed in Section 4.2.

1.3.4 Landfill Gas Chemical Analysis §1150.1(e)(4)

LFG samples were collected from the gas compressor inlet location and from each of the three LFG flaring systems on November 29 and 30, 2004, and were analyzed for fixed gases, TGNMOs, toxic air contaminants, and hydrogen sulfide. Results are discussed in Section 5.2 and provided in Appendix E.

A new Landfill Gas Treating System Permit to Operate No. F71948 (A/N 435883) was issued in December 2004. This new permit removed a condition that required daily hydrogen sulfide monitoring of the gas compressor.

1.3.5 Ambient Air Monitoring (24-hour) §1150.1(e)(5)

Four ambient air samplers were used to collect upwind (south) and downwind (north) samples on November 4, 2004. Two ambient air samplers were positioned upwind at the landfill property boundary and two downwind at the landfill property boundary (Figure 1). Low concentrations of benzene, carbon tetrachloride, toluene, xylenes, methane, and TGNMOs were detected in all four air samples, and a low concentration of dichloromethane was detected in in three of the four air samples (AA-1, AA-2 and AA-4). The results are discussed in Section 6.2, and field and laboratory data from ambient air monitoring are included in Appendix F.

1.3.6 SCAQMD Rule 431.1 Sulfur Monitoring

Monitoring for total reduced sulfur compounds (TRS) was conducted in accordance with the tiered methodology described in the Alternative Monitoring Plan for SCAQMD Rule 431.1, Bradley Landfill, dated April 1, 2003 (A/N 267044). The table below presents the tiered approach, which includes monitoring with colorimetric tubes and the collection of a ten-liter bag sample in a Tedlar bag from each LFG flare and gas plant inlet location. The Bradley Landfill is currently designated with a Tier I Action level.

A new Landfill Gas Treating System Permit to Operate No. F71948 (A/N 435883) was issued in December 2004. This new permit removed the condition requiring daily monitoring of the gas compressor.

Action Level	AQMD Modified Tiers	Sampling Requirement
Tier I	TS < 100 ppm	-Quarterly using Method 307-91
		-Monthly using TUBE
Tier II	$100 \text{ ppm} \leq \text{TS} < 120 \text{ ppm}$	-Monthly using Method 307-91
		-Weekly using TUBE
Tier III	120 ppm < TS <130 ppm	-Weekly using Method 307-91
		-Daily using TUBE
Tier IV	TS > 130 ppm	-Potential Rule 431.1 Violation
		-Inform AQMD immediately following R430
		Breakdown Provisions
		-Daily using Method 307-91

Collected samples are analyzed within 24 hours in accordance with SCAQMD Method 307-91. A detailed discussion of the sulfur content is discussed in Section 5.2.

Monthly H₂S sampling was conducted on October 27, November 29, and December 22, 2004. Samples were collected in 10-liter tedlar bags and were sent to AtmAA, Inc. for testing as required by Rule 431.1. Analytical results are presented in Appendix E and are summarized below.

Table 1-1						
	Sulfur Monitoring Results					
Date	Daily	Flare 1	Flare 2	Flare 3		
	Maximum	H_2S	H_2S	H_2S		
	Compressor	concentration	concentration	concentration		
	(Gas Sales)	(ppmv)	(ppmv)	(ppmv)		
10/27/04	41.9	49.2	41.3	16.0		
11/29/04	48.1	35.8	31.3	13.8		
12/22/04	53.2	41.2	37.5	9.8		

1.3.7 Recent Landfill Activity

Landfill operations limited integrated and instantaneous surface emission monitoring in some areas of the landfill. Active filling areas where monitoring could not be conducted are shown on Figure 1. In October 2004, active filling locations included Grids 20, 21, 22, 23, 37, 39, and 24. Active filling locations in November 2004 included Grids 37, 39, 45, 47, 49, 52, 55 and 60. In December 2004, active filling locations included Grids 47, 49, 52, 55, 48, 51, and 54.

Monitoring of Grid C is performed on a quarterly basis and the results are presented in Table 3-1.

2 SUBSURFACE PERIMETER PROBE MONITORING §1150.1(e)(1)

2.1 Subsurface Perimeter Probe Monitoring Protocol

Subsurface perimeter probe monitoring was performed in October, November, and December, 2004. Monthly gas samples are collected from perimeter probes yielding the highest field-obtained TOC concentrations in percent by volume, measured as methane. Locations of the subsurface perimeter monitoring probes are shown on Figure 1, Surface Emissions Monitoring Site Plan.

Alternative monitoring procedures were used in the area of perimeter probe E-8D. These procedures include monitoring of the probes and performing surface emission monitoring of Grid 31-D, as specified in the Rule 1150.1 Compliance Plan for Bradley Landfill. The alternative procedures are implemented when TOC concentrations meet or exceed five (5) percent by volume, measured as methane.

Static pressure, in inches of water column, was measured prior to evacuating each probe. Probes were evacuated at a continuous rate until a stable methane concentration was observed. During the fourth quarter of 2004, a calibrated GEM-2000 Gas Extraction Monitor was used to measure methane by percent volume, methane by percent of LEL, oxygen by percent volume, carbon dioxide by percent volume, balance gas (nitrogen) by percent volume and static pressure in inches of water column.

2.2 Subsurface Perimeter Probe Monitoring Results

Perimeter probes with the highest field-obtained TOC concentrations, taken, during the monthly monitoring event for each month, were selected to be sampled for laboratory analysis of TOC as methane. During the monthly probe monitoring events, field readings were taken on October 18, 21, 22, and 26, November 24, 26, and 29, and December 20, 21, and 23, 2004 for all probes. Methane was detected in Probe E-8D at 26.1, 56.7, and 46.7 percent, on October 26, November 26, and December 23, 2004, respectively. All other probe readings taken during the monthly monitoring events for the quarter were 0.0 percent methane. Since methane was not detected at other probes during the monthly monitoring event in October, November and December, Tedlar bag samples were collected only from Probe E-8D. Laboratory analysis of gas from this probe yields more consistent TOC as methane concentrations than readings taken with the GEM 2000. The fourth quarter 2004 laboratory bag samples collected on October 26, November 29, and December 22, 2004 from Probe E-8D contained concentrations of 29.4, 47.2, and 50.2

TOC as methane, respectively, as reported by the laboratory. Field and laboratory data for perimeter probe monitoring are provided in Appendix B.

Perimeter probes that were selected to be sampled, during the monthly monitoring event, based on the highest field-obtained TOC as methane concentrations for each month are listed below::

Table 2-1						
	Perimeter Probe Sampling Results					
Month	Month Probe # Field TOC as methane Lab TOC as Methane					
Concentration (%) Concentration						
Oct-04	E-8D	26.1	29.4			
Nov-04	E-8D	56.7	47.2			
Dec-04	E-8D	46.7	50.2			

3.1 Integrated Surface Emission Sampling Protocol

The fourth quarter 2004 integrated surface emission monitoring and sampling was conducted on October 19 and 20, 2004. Monitoring and sampling were conducted consistent with SCAQMD's Guidelines for Implementation of Rule 1150.1.

Prior to sampling, the landfill surface was divided into approximate 50,000 square-foot grids with the majority of the grids having dimensions 100 feet by 500 feet. Figure 3, Integrated Surface Grids Location Map, shows the location of each grid.

Integrated surface sampling (ISS) equipment, field protocol, and QA procedures used in this program were derived from the SCAQMD Guidelines for Implementation of Rule 1150.1, in accordance with the compliance plan for the landfill. RES Environmental, Inc. (RES) technicians sampled each grid using the walk pattern and collection rate specified in the guidelines. Each portable Integrated Sampler is comprised of a Tedlar bag, DC pump, and a calibrated flow controller. Each bag sampler is calibrated by a film (bubble meter) calibration method. Each Tedlar bag sample was purged three times with ultra-pure nitrogen before sampling and enclosed in a light-sealed box after sampling. Analyses were performed within 72 hours after sampling was conducted. Tedlar bag QA/QC checklist is in Appendix G.

Wind monitoring data recorded at the on-site wind station were reduced to calculate 10-minute average wind speeds for those times when sampling was performed. Each integrated grid sample was collected over a continuous 25-minute period.

RES technicians walked grids at approximate 25-foot intervals for a total of 2,600 linear feet in a period of 25 minutes. The integrated sampler wand was extended to no greater than one inch above the landfill surface. Integrated surface samples were collected at an approximate rate of 333 cubic centimeters per minute (cc/min). The technicians recorded the starting and ending time of each grid traverse, along with the average rotameter flow rate and the prevailing wind speed and direction. An OVA was used to measure the TOC concentration (in ppm, as methane) from each of the 10-liter bag samples collected from the pre-numbered grids.

The landfill sampling grids are divided into Types A, B, and C. All grid types are sampled quarterly. Type A surface grids have no exclusions from sampling, and sampling is conducted in accordance with Rule 1150.1. Type B surface grids contain steep slopes or steep slopes and dense vegetation. Sampling of Type B grids consists of sampling the toe and top of 128 and 130. Grids 121 and 122, each defined as a Type "B" Grid, have been re-designated as Type "A" Grids due to the additional refuse that has been put in place. Vacuum readings from all LFG extraction wells located within Type B grids are recorded monthly and included in the quarterly report. Type C grids are located in the area of active recycling operations. Sampling of Type C surface grids are performed quarterly, during the integrated sampling event. Sampling of Type C surface

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grids consists of sampling a course of 2,600 linear feet but not less than 1,900 linear feet in each grid for a continuous 25-minute period, excluding stockpiles, stored equipment and recycling equipment. Vacuum readings from all gas extraction wells located within Type C active recycling grids are recorded monthly and included in the quarterly report. Vacuum readings recorded in the third quarter from the extraction wells located in Type B and C Grids are presented in Table 3-1.

Due to active landfill operations, integrated landfill surface measurements were not obtained for Grids 20, 21, 22, 23, 37, 39, and 24 in October 2004.

Tedlar bag samples from Grids 111 and 112 were sent to AtmAA, Inc. for further analysis of toxic air contaminants, methane, and TGNMOs. Technicians responsible for transporting the integrated samples recorded pertinent information on a chain-of custody form included in Appendix C, Integrated Surface Emission Sampling. Additional personnel, including lab technicians, also recorded their signatures on the chain-of-custody form.

Integrated surface samples were collected when the average wind speed was less than five miles per hour and the instantaneous wind speed was less than ten miles per hour. Integrated samples were not collected within 72 hours of a rainstorm. Wind speed and direction measurements are tracked on the chart included in Appendix C, Integrated Surface Emission Sampling. Other weather data taken during integrated monitoring can also be found in Appendix C.

3.2 Integrated Surface Monitoring Results

The TOC as methane concentration collected from each grid is listed in Table 3-1, Integrated Surface Sampling Field Summary. Field data sheets are presented in Appendix C. All of the integrated TOC as methane readings were within compliance limits, as set forth by SCAQMD Rule 1150.1. Typically, the two samples having the highest field TOC as methane concentrations are sent to the laboratory for further analysis. The TOC as methane background reading was 5.0 ppm. During surface emissions monitoring, TOC as methane concentrations above background were no more than 3 ppm. Samples from Grids 111 and 112 were selected for laboratory analysis.

3.3 Integrated Surface Sampling Laboratory Results

Integrated samples were collected from Grids 111 and 112 and were transported to AtmAA, Inc. on November 23, 2004 for further analysis. Table 3-2, Integrated Surface Sampling, Laboratory Summary, lists the laboratory analysis methods and results.

Laboratory analysis by Method TO-15 of the sample from Grid 111 (Lab Sample ID 03284-15) detected benzene, dichloromethane, carbon tetrachloride, toluene, and xylenes. The TGNMO concentration was 1.51 ppmv and the methane concentration was 39.9 ppmv.

Laboratory analysis by Method TO-15 of the sample from Grid 112 (Lab Sample ID 03284-16) detected benzene, dichloromethane, carbon tetrachloride, toluene, and xylenes. The TGNMO concentration was 1.60 ppmv and the methane concentration was 16.2 ppmv.

4.1 Instantaneous Surface Emission Monitoring Protocol

Quarterly instantaneous surface emission monitoring was conducted in October, November and December 2004 by RES Inc. technicians and consisted of monitoring the landfill surface for the presence of LFG surface emissions. Instantaneous Surface Monitoring (ISM) was performed using procedures and equipment described in the SCAQMD Guidelines for Implementation of Rule 1150.1 and was consistent with the compliance plan for the Landfill.

A portable flame ionization detector (FID), which meets or exceeds all guideline specifications was used to obtain instantaneous measurements of TOC as methane concentrations immediately above the surface of the grids. Calibrations were performed on the OVA equipment using factory specifications. While traversing the disposal area, the detector probe was held within 0 to 3 inches above the landfill surface to obtain the readings. A surface inspection was also performed during monitoring to identify potential cracks in the landfill cover.

Using the OVA, RES technicians walked a pattern across the landfill surface consisting of linear traverses approximately 100 feet apart at an approximate rate of 100 to 110 feet per minute. TOC as methane measurements were recorded at approximately every 100 linear feet. While monitoring, the OVA wand and funnel assembly was held no further than 0 to 3 inches above the landfill surface.

In addition to walking the traverses, the OVA was used by EMCON/OWT personnel to measure TOC as methane concentrations at landfill surface fissures, along the refuse/natural soil interface, and at corrugated metal pipes, gas extraction wells and other points visually identified as areas potentially having repeatable TOC as methane concentrations greater than 500 ppm.

The landfill sampling grids are divided into Types A, B, and C. Type A surface grids have no exclusions from sampling and sampling is conducted in accordance with Rule 1150.1. Type B surface grids contain steep slopes or steep slopes and dense vegetation. Sampling of Type B grids consists of sampling the toe and top of Grids 128 and 130. Vacuum readings from gas extraction well 39, located within a Type B grid, is recorded monthly and included in the quarterly report. Twenty-two Type C grids are located in the area of active recycling operations. Sampling of Type C surface grids consists of sampling a course of 2,600 linear feet but not less than 1,900 linear feet in each grid for a continuous 25-minute period, excluding stockpiles, stored equipment and recycling equipment. Vacuum readings from all LFG extraction wells located within Type C active recycling grids are recorded monthly and included in the quarterly report. Vacuum readings recorded in the fourth quarter from the extraction wells located within Type B and C grids are presented in Table 3-3.

Areas that were not monitored due to landfill operation are shown on Figure 1.

Wind speed and direction were measured using a Climatronics portable meteorological station mounted on the roof of the main office building at the landfill described in Section 7, Field Instrumentation and Equipment Specifications. Measurements were recorded on a continuous strip chart recorder. The wind speed and direction monitor was erected in the central portion of the site away from canyon walls and obstructions at an approximate elevation of 1,300 feet above mean sea level.

4.2 Instantaneous Surface Emission Monitoring Results

Monitoring measurements obtained during the months of October, November, and December exceeded 500 ppm as methane in Grids 23, 68, 93, 111, 112, 120, 123, 124, and 131. Grids with surface emissions exceeding 500 ppm are shown in Table 4-1. All other grids were below 500 ppm TOC as methane.

Recorded concentrations of TOC as methane ranged from 0.0 to 100,000 ppm above background. In accordance with SCAQMD Rule 1150.1 regarding detecting TOC as methane concentrations exceeding 500 ppmv, each of these grids were re-sampled within 10 calendar days of the original detection. Figures 1, 2, and 3 show grids where surface emissions exceeded 500 ppm TOC as methane during instantaneous monitoring. During the period of instantaneous monitoring, the wind speed average was below 5 miles per hour and the instantaneous wind speed was below 10 miles per hour.

5.1 Landfill Gas Characterization Protocol

A total of four LFG samples were collected from the compressor inlet and from the three (3) LFG flares on November 29 and 30, 2004. A portable pump was used to draw the LFG sample into a 10-liter Tedlar Bag enclosed in a light sealed box. The LFG sample was collected over a continuous ten-minute period.

5.2 Landfill Gas Sample Laboratory Results

Samples BL-001 (Gas Plant), BL-002 (Flare #3), BL-003 (Flare #1), and BL-004 (Flare #2) were taken to AtmAA, Inc. on November 30, 2004. The gas samples were analyzed for toxic air contaminants, TGNMOs, fixed gases, and hydrogen sulfide. Table 5-2, Landfill Gas Sample Laboratory Summary, gives the laboratory methods and results for these constituents. Appendix E, Landfill Gas Sampling includes the laboratory report prepared by AtmAA, Inc.

Samples BL-001, BL-002, BL-003, and BL-004 contained detectable concentrations of one or more of the following compounds: benzene, chlorobenzene, 1,1-dichloroethane, 1,1-dichloroethylene, dichloromethane, dichlorobenzenes, 1,2-dichloroethane, trichloroethene, perchloroethylene, toluene, 1,1,1-trichloroethane, vinyl chloride, and total xylenes. Laboratory results for samples collected from the gas plant and each flare are presented in Appendix E.

5.3 SCAQMD Rule 431. Sulfur Monitoring

Sulfur content of the LFG (as H₂S) leaving the facility was monitored daily, except for weekends and holidays as required by Permit To Operate No. R-D229242 (A/N 201385), Condition No. 5. According to the colorimetric tube results, the gas compressor did not exceed 100 ppm H₂S during the quarter. The maximum reading during the quarter was 76 ppm H₂S. See Table 5-3 for Quarterly H₂S Monitoring Results.

A new Landfill Gas Treating System Permit to Operate No. F71948 (A/N 435883) was issued in December 2004. This new permit removed the daily monitoring conditions for the gas compressor.

Table 5-1 - Landfill Gas Summary of Results				
Components	Gas Plant (BL-	Flare 1	Flare 2 (BL-	Flare 3 (BL-
	001)	(BL004)	003)	002)
TGNMO	9,700 ppmv	4,960 ppmv	2,580 ppmv	3,880 ppmv
Hydrogen Sulfide	48.1 ppmv	35.8 ppmv	31.3 ppmv	13.8 ppmv
Methane	38.2%	39.5%	29.8%	21.2%

6 AMBIENT AIR SAMPLING§1150.1(e)(5)

6.1 Ambient Air Sampling Protocol

Fourth quarter 2004 ambient air sampling was performed on November 4, 2004. Sampling was performed consistent with SCAQMD Rule 1150.1, Attachment A.

Four ambient air samplers were used to collect upwind (south) and downwind (north) samples. Two ambient air samplers were placed upwind at the landfill property boundary and two downwind at the landfill property boundary. Figure 1, Surface Emissions Monitoring Site Plan, shows the ambient air sample locations.

The ambient air sampling program was designed in accordance with the Guidelines for Implementation of Rule 1150.1 and the compliance plan requirements issued by the SCAQMD. All procedures and equipment used in the program are consistent with guideline specifications.

The Landfill compliance plan requires the collection of four (4) 12-hour samples located at the landfill perimeter. These 12-hour samples are representative of the predominant upslope and down slope wind flow patterns (two per location) during each 12-hour time periods. These locations were selected based upon evaluation of current and historic wind monitoring data collected on site. Sampling stations are positioned to provide good meteorological exposure to the predominant upslope flows and anticipated nighttime local air drainage patterns typically encountered at this site.

Ambient air samplers used at the landfill were constructed, installed, and operated to meet SCAQMD design criteria and performance specifications published in the Rule 1150.1 guidelines. Light-sealed boxes containing individual 10-liter Tedlar sample bags were housed within each sampling station enclosure. Analyses were performed within 72 hours after sampling was concluded

A Climatronics portable wind speed and direction station connected to a continuous recorder was used to record wind speed and direction for the entire duration of integrated sampling. Section 7, Field Instrumentation and Equipment Specifications, describes both the ambient air sampler assembly and the wind station in greater detail. Tedlar bags used for collecting the 24-hour integrated samples were purged three times with nitrogen and tested for leaks prior to usage. Appendix G, Tedlar Bag Quality Assurance and Control,

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includes a Tedlar bag checklist that summarizes the pertinent data regarding this procedure

The four samples were analyzed for toxic air contaminants, methane, and TGNMOs by AtmAA, Inc. The technicians responsible for transporting the integrated samples recorded pertinent information on a Chain-of-Custody form included in Appendix F, Ambient Air Sampling. Additional personnel receiving the integrated samples recorded their signatures on the Chain-of-Custody form.

Ambient air samples were collected when the average wind speed was five miles per hour or less, and the instantaneous wind speed was less than fifteen miles per hour. The samples were not collected within 72 hours of a rainstorm. Wind speed and direction charts are included in Appendix F.

6.2 Ambient Air Laboratory Results

Upwind ambient air samples (AA-1, AA-4) and downwind ambient air samples (AA-2, AA-3) were sent to AtmAA, Inc. on November 4, 2004 for analysis. Table 6-1, Ambient Air Samples Laboratory Summary, summarizes the laboratory methods and results.

Upwind Samples

Laboratory analysis of sample AA-1 (Lab Sample 03094-19) detected a TGNMO concentration of 1.91 ppmv. The methane concentration was 2.24 ppmv, benzene concentration was 0.67 ppmv, dichloromethane concentration was 0.32, carbon tetrachloride concentration was 0.12 ppmv, toluene concentration was 2.92 ppmv, and total xylenes concentration was 2.17 ppmv.

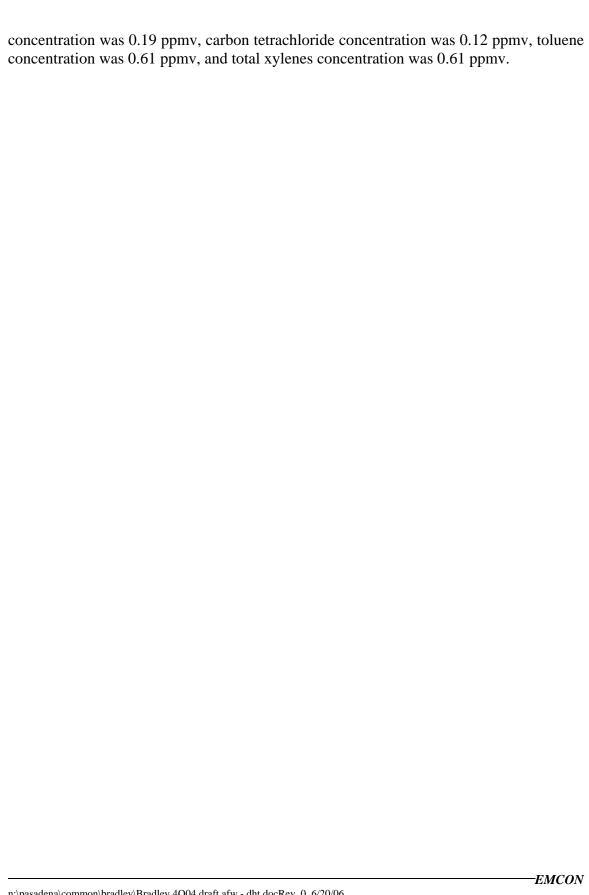
Laboratory analysis of sample AA-4 (Lab Sample 03094-22) detected a TGNMO concentration of 1.57 ppmv. The methane concentration was 2.53 ppmv, benzene concentration was 0.18 ppmv, dichloromethane concentration was 0.12, carbon tetrachloride concentration was 0.12 ppmv, toluene concentration was 0.91 ppmv, and total xylenes concentration was 0.61 ppmv.

Downwind Samples

Laboratory analysis of sample AA-2 (Lab Sample 03094-20) detected a TGNMO concentration of 1.73 ppmv. The methane concentration was 2.72 ppmv, benzene concentration was 0.60 ppmv, dichloromethane concentration was 0.33, carbon tetrachloride concentration was 0.12 ppmv, toluene concentration was 2.92 ppmv, and total xylenes concentration was 2.11 ppmv.

Laboratory analysis of sample AA-3 (Lab Sample 03094-21) detected a TGNMO concentration of 1.30 ppmv. The methane concentration was 1.90 ppmv, benzene

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7 FIELD INSTRUMENTATION AND EQUIPMENT SPECIFICATIONS

7.1 Meteorological Station

A Climatronics portable meteorological station is used for measuring wind speed and direction during instantaneous and integrated surface sampling, and ambient air monitoring. This monitor collects continuous wind data during all monitoring events. The wind system consists of a Climatronics monitor, equipped with F460 wind sensors with threshold speeds of 0.50 miles per hour and a portable dual channel recording strip chart.

A continuous recorder and battery is housed in a portable steel case to prevent damage to the system. The continuous recorder averages wind speed and direction measurements in 15-minute increments. Measurements are recorded on a strip chart. The date, time, and wind speed and direction measurements are recorded daily after each instantaneous or integrated sampling session is completed.

A supervisor monitored the wind speed during instantaneous and integrated sampling sessions so that technicians are continuously aware of the wind speed when walking traverses or grid patterns.

7.2 Organic Vapor Analyzer

A portable Organic Vapor Analyzer (OVA) manufactured by Foxboro was used for monitoring the surface emission concentration of total organic compounds (TOCs) during instantaneous monitoring, and for measuring TOC concentrations in integrated surface samples and perimeter probes (ppm range). The OVA used had the following specifications:

• Range: 0-10,000 ppm (v/v)

• Minimum detectable limit: 5 ppm

• Response time: 15 seconds

• Flame out indicator: audible and visual

Accuracy: +/-4%Precision: +/-3%

• Ambient temperature: 0-50 degrees Celsius

7.3 GEM-500 Gas Extraction Monitor

A GEM-500 Gas Extraction Monitor, manufactured by LANDTEC for use at landfills, was used for monitoring LFG composition. Compounds measured include methane, carbon dioxide, oxygen, and balance gas as nitrogen in percent volume and methane as percent of LEL.

The GEM-500 specifications are as follows:

	Sensor Range Imperial	Resolution Imperial
Methane - CH ₄ :	0-100%	0.1%
Carbon dioxide – CO ₂ :	0-75%	0.1%
Oxygen – O ₂ :	0-100%	0.1%
Pressure (differential): (static):	0-10" w.c. 0-100" w.c.	0.01" w.c. 0.1"w.c.

GEM-500 typical accuracy:

Concentration	%CH ₄ by Volume	%CO ₂ by Volume	%O ₂ by Volume
5% LEL	+/- 0.3%	N/A	+/25%
75%	+/- 1.9%	+/- 3.0%	N/A
100%	+/- 1.95%	N/A	N/A

7.4 GEM-2000 Gas Extraction Monitor

A GEM-2000 Gas Extraction Monitor, manufactured by LANDTEC for use at landfills, was used for monitoring LFG composition. Compounds measured include methane, carbon dioxide, oxygen, and balance gas as nitrogen in percent volume and methane as percent of LEL.

The GEM-2000 specifications are as follows:

	Sensor Range Imperial	Resolution Imperial
Methane - CH ₄ :	0-100%	0.1%
Carbon dioxide – CO ₂ :	0-100%	0.1%
Oxygen – O ₂ :	0-25%	0.1%
Pressure (differential): (static):	0-10" w.c. 0-100" w.c.	0.01" w.c. 0.1"w.c.

GEM-2000 typical accuracy:

Concentration	%CH ₄ by Volume	%CO ₂ by Volume	%O ₂ by Volume
0-5%	+/- 0.5%	+/- 0.5%	+/25%
5-15%	+/- 1%	+/- 1%	N/A
15%-FS	+/- 3%	N/A	N/A

7.5 Integrated Surface Sampler

Each portable Integrated Sampler is comprised of a Tedlar bag, DC pump, and a calibrated flow controller. Each bag sampler is calibrated by a film (bubble meter) calibration method. Each Tedlar bag sample was purged three times with ultra-pure nitrogen before sampling and enclosed in a light-sealed box after sampling. Analyses were performed within 72 hours after sampling was conducted.

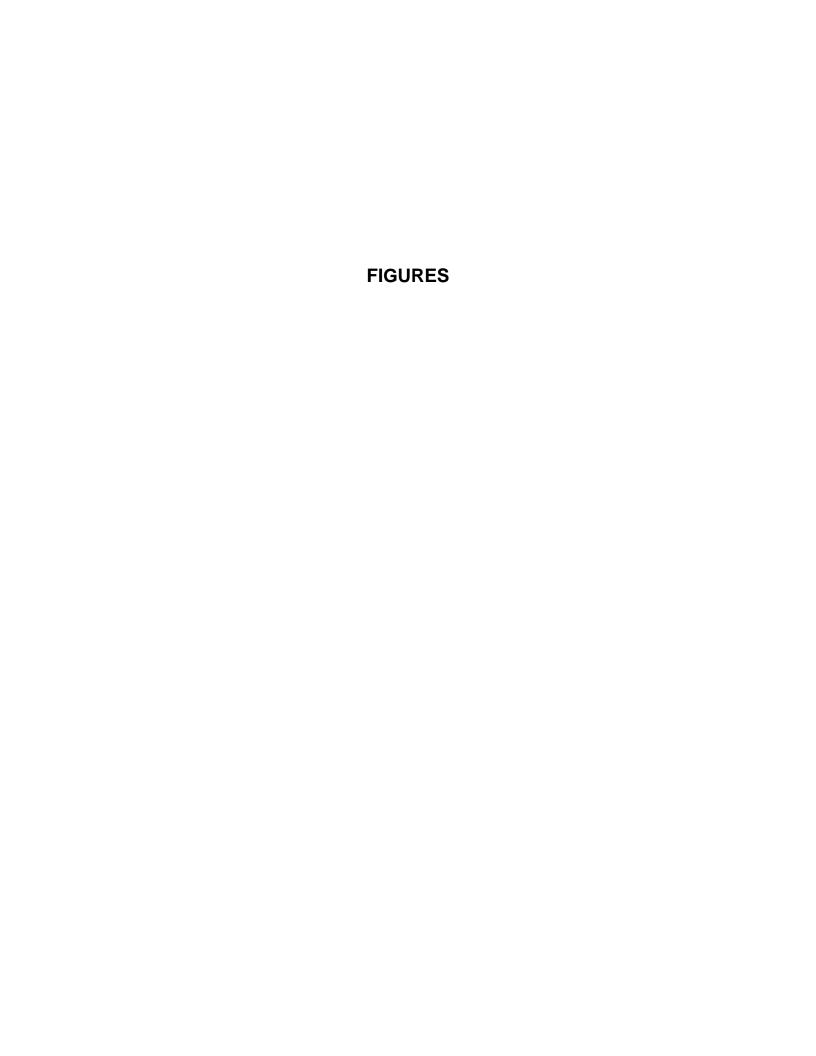
7.6 Tedlar Bags

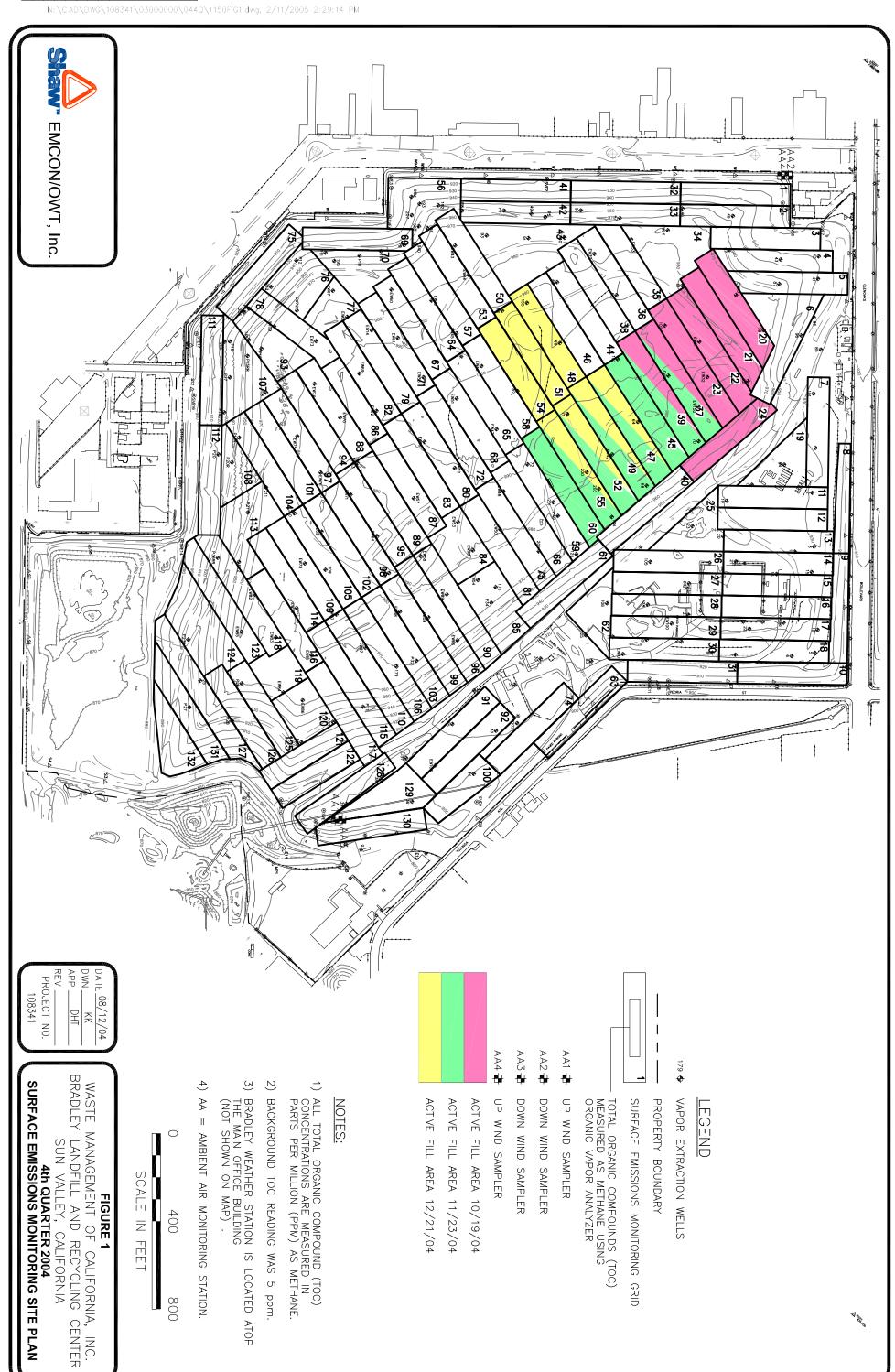
Ten-liter bags, made of Tedlar material, were used to collect integrated samples, and for the collection of the raw gas sample at the main gas conveyance line. Each Tedlar bag, prior to use, is filled with nitrogen for a minimum of 24 hours and checked for leaks. Each used Tedlar bag is purged three times with nitrogen and refilled with nitrogen for a minimum of 24 hours and checked for leaks. Each Tedlar bag is numbered for tracking purposes and each number corresponds with the number of the integrated sampling grid.

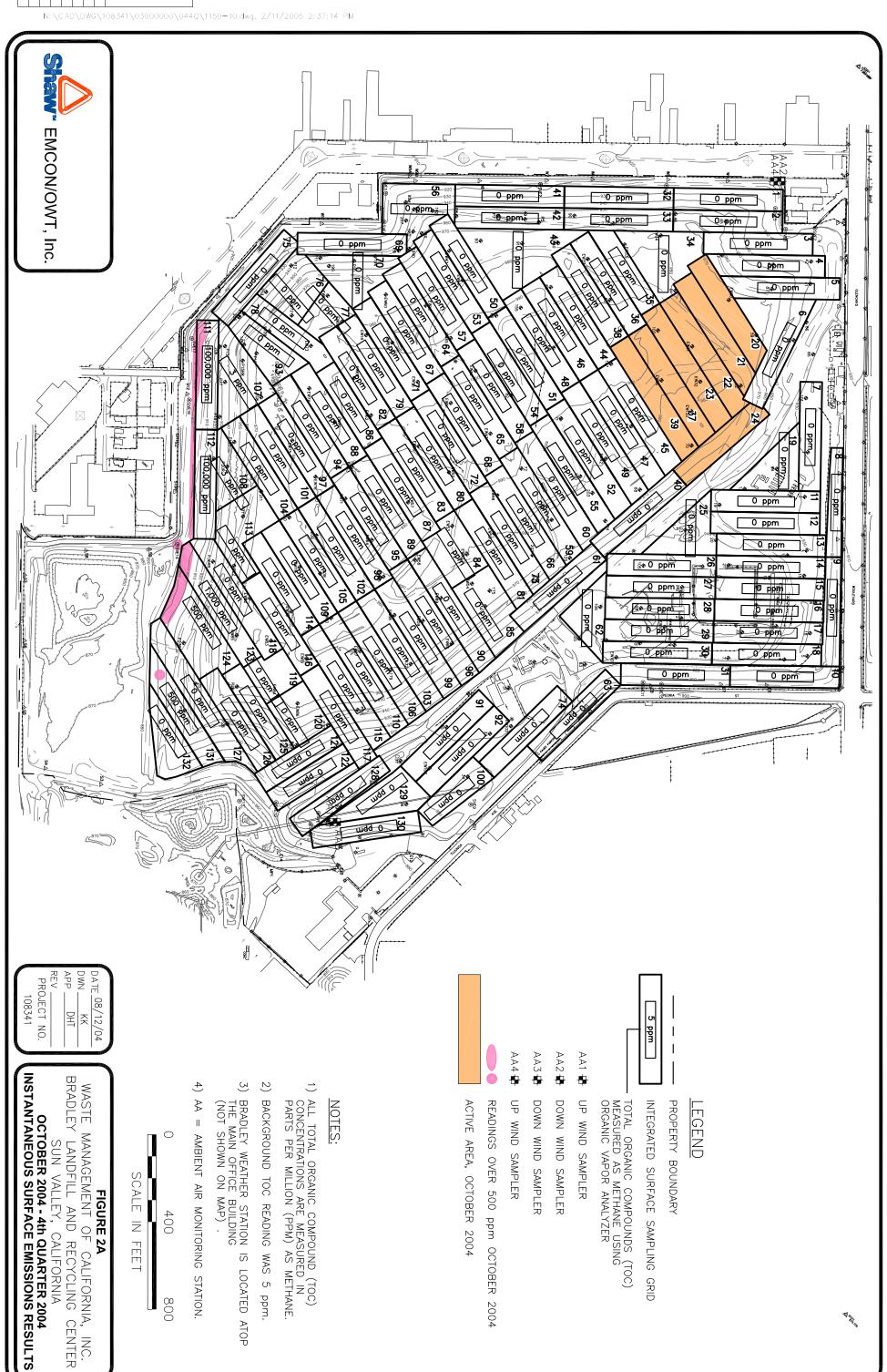
LIMITATIONS

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.







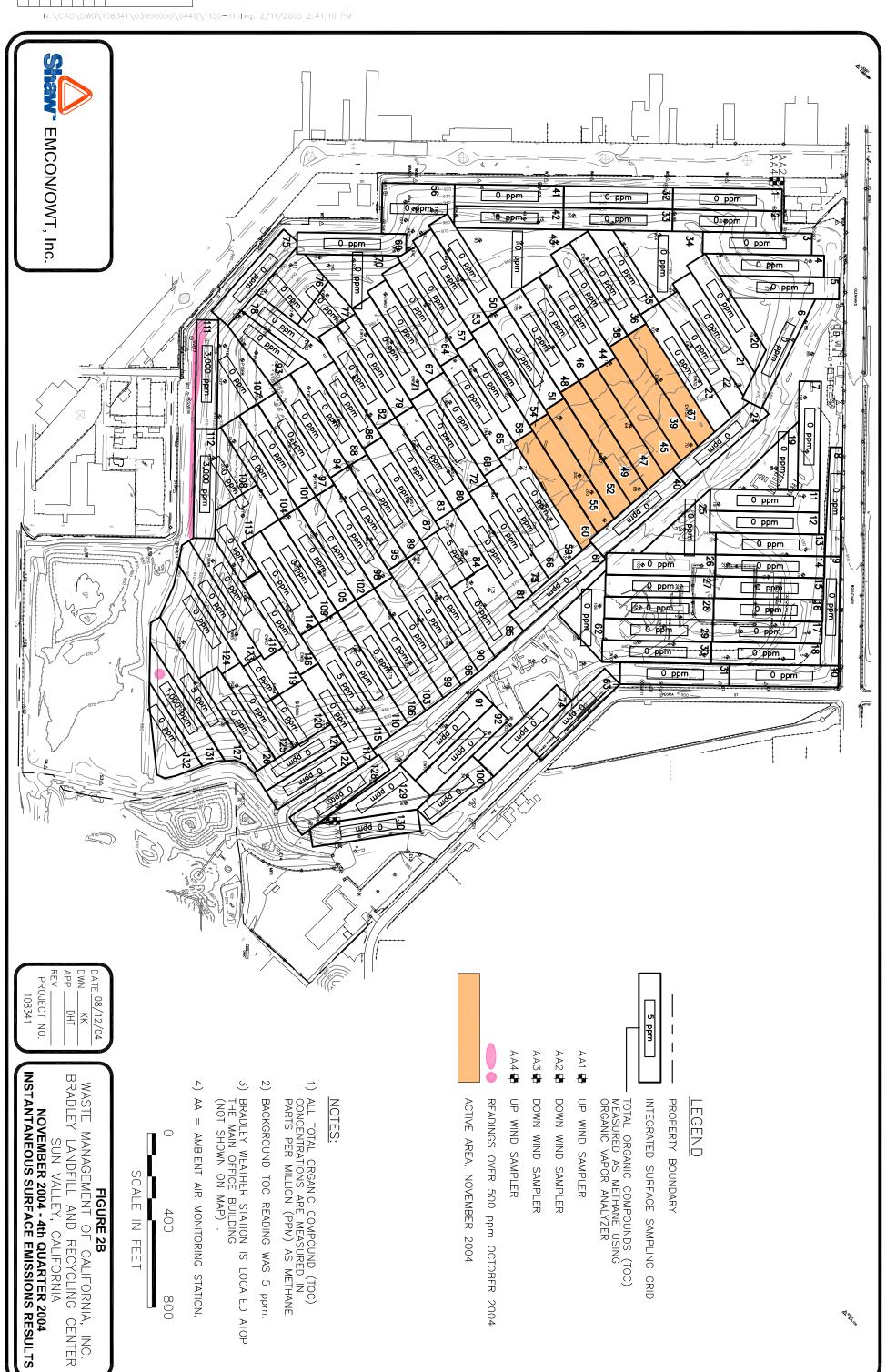






Table 3-2 Integrated Surface Sampling Laboratory Summary

Bradley Landfill & Recycling Center (BLRC)
November 23, 2004

SCAQMD Rule 1150.1 Components Analysis in Integrated Surface Tedlar Bag Samples

		T		
Compound	Sample ISS Grid 111 Results (ppbV)	Sample ISS Grid 112 Results (ppbV)	Reporting Limit (ppbV)	
Hydrogen Sulfide	<50	<50	50	
Benzene	0.42	0.47	1.6	
Benzyl Chloride	< 0.4	< 0.4	0.97	
Carbon Tetrachloride	0.10	0.11	0.80	
Chlorobenzene	< 0.2	<0.2	1.1	
Chloroform	<0.1	<0.1	1.0	
1,1-Dichloroethane	<0.1	<0.1	1.2	
1,1-Dichloroethylene	<0.1	<0.1	1.3	
1,2-Dibromoethane	<0.1	<0.1	0.65	
Dichlorobenzenes ⁽¹⁾	<1.1	<1.1	0.83	
Dichloromethane	0.16	0.98	< 0.1	
1,2-Dichloroethane	<0.1	<0.1	1.2	
1,1,1-Trichloroethane	<0.1	<0.1	0.92	
Trichloroethene	<0.1	<0.1	< 0.1	
Perchloroethene	<0.1	<0.1	< 0.1	
Toluene	1.30	1.30	1.3	
Total Xylenes*	2.00	1.84	1.2	
Vinyl Chloride	<0.1	<0.1	2.0	

SCAQMD Rule 1150.1 Components Analysis in Integrated Surface Tedlar Bag Samples

Compound	Sample ISS Grid 111 Results (ppmV)	Sample ISS 112 Results (ppmV)	Reporting Limit (ppmV)
Methane	39.9	16.2	0.5
Total Non-Methane Organics (as methane)	1.51	1.60	1.0

< Not detected at or above the method detection limit.

^{*}Total xylenes reported includes the sum of the detected concentrations of m-& p-xylenes and o-xylenes.

⁽¹⁾ total amount containing meta, para, and ortho isomers

Table 5-2

Landfill Gas Sample - Laboratory Summary
Bradley Landfill & Recycling Center (BLRC)
November 29 and 30, 2004

	Gas Plant	Flare #1	Flare #2	Flare #3	Reporting
Compound	BL-001	BL-003	BL-004	BL-002	Limit
	(ppbV)	(ppbV)	(ppbV)	(ppbV)	(ppbV)
Benzene	3,740	2,860	1,280	6,550	<20
Benzyl Chloride	<40	<40	<40	<40	<40
Carbon Tetrachloride	<30	<30	<30	<30	<30
Chlorobenzene	168	71.9	60.7	136	<30
Chloroform	<20	<20	<20	<20	<20
1,1-Dichloroethane	294	306	109	135	<20
1,1-Dichloroethylene	74.9	82.9	<40	<40	<30
Dichloromethane	1,020	963	148	244	<30
1,2-Dibromoethane	<30	<30	<30	<30	<30
Dichlorobenzenes ⁽¹⁾	3,120	2480	1550	942	<30
1,2-Dichloroethane	97.3	75.4	35.6	39.8	<20
Trichloroethene	815	619	246	313	<20
Perchloroethylene	2,060	1,030	575	675	<20
Toluene	36,400	20,300	10,900	14,800	<20
1,1,1-trichoroethane	<20	<20	<20	<20	<20
Total Xylenes*	20,990	4,555	3,992	5,830	<20
Vinyl Chloride	170	178	479	306	<20
Compound	(ppmV)	(ppmV)	(ppmV)	(ppmV)	(ppmV)
Total Non-Methane Organics (as Methane)	9,700	4,960	2,580	3,880	<20
Hydrogen sulfide	48.1	35.8	31.3	13.8	< 0.5
Carbonyl sulfide	0.33	0.51	0.27	0.21	< 0.5
Methyl mercaptan	3.80	3.82	0.72	2.24	< 0.06
Ethyl mercaptan	< 0.1	<0.1	0.14	<0.1	< 0.12
Dimethyl sulfide	6.48	7.12	1.18	6.21	<0.1
Carbon disulfide	0.12	0.089	< 0.06	< 0.06	< 0.09
Isopropyl mercaptan	0.28	0.28	< 0.06	0.060	< 0.06
n-propyl mercaptan	< 0.06	< 0.06	< 0.06	< 0.06	< 0.06
Dimethyl disulfide	0.24	0.19	0.087	0.20	< 0.06
Total reduced sulfur	59.7	48.1	33.8	22.9	< 0.5
BTU / ft.3	394	403	303	219	<1

Table 5-2 (Continued) Landfill Gas Sample - Laboratory Summary

Bradley Landfill & Recycling Center (BLRC) November 29 and 30, 2004

SCAQMD Rule 1150.1 Components Analysis in Integrated Surface Tedlar Bag Samples								
Compound	Gas Plant							
Nitrogen	24.1	22.6	39.0	47.6	0.1			
Oxygen	1.42	1.38	2.72	7.52	0.1			
Methane	38.2	39.5	29.8	21.4	0.1			
Carbon dioxide	34.6	35.1	28.3	21.2	0.1			

ND: Not detected.

The reported oxygen concentration includes any argon present in the sample. Calibration is based on a standard atmosphere containing 20.95% oxygen and 0.93% argon.

(1) Total amount containing meta, para, and ortho isomers.

^{*}Total xylenes reported includes the sum of the detected concentrations of m-& p-xylenes and o-xylenes.

^{** =} Coeluting Compounds

Table 6-1 Ambient Air Sampling Laboratory Summary

Bradley Landfill & Recycling Center (BLRC) November 4, 2004

SCAQMD Rule 1150.1	Components Anal	vsis in Ambient Air	Tedlar Bag Samples

Compound	Sample Ambient Air AA-1 Results (ppbV)	Sample Ambient Air AA-2 Results (ppbV)	Reporting Limit (ppbV)	
Hydrogen Sulfide	<50	<50	50	
Benzene	0.67	0.60	1.6	
Benzyl Chloride	< 0.4	<0.4	0.97	
Carbon Tetrachloride	0.12	0.12	0.8	
Chlorobenzene	<0.1	<0.1	1.1	
Chloroform	0.12	0.12	1.0	
1,1-Dichloroethane	<0.1	<0.1	1.2	
1,1-Dichloroethylene	<0.1	<0.1	1.3	
1,2-Dibromoethane	<0.1	<0.1	0.65	
Dichlorobenzene ⁽¹⁾	<1.1	<1.1	0.83	
Dichloromethane	0.32	0.33	< 0.1	
1,2-Dichloroethane	<0.1	<0.1	1.2	
1,1,1-Trichloroethane	<0.1	<0.1	0.92	
Perchloroethene	<0.1	<0.1	< 0.1	
Toluene	2.92	2.92	1.3	
Total Xylenes*	2.17	2.11	1.2	
Trichloroethene	<0.1	<0.1	0.93	
Vinyl Chloride	<0.1	<0.1	2.0	

SCAQMD Rule 1150.1 Components Analysis in Ambient Air Tedlar Bag Samples

Compound	Sample Ambient Air AA-1 Results (ppbV)	Sample Ambient Air AA-2 Results (ppbV)	Reporting Limit (ppmV)
Methane	2.24	2.72	0.5
Total Non-Methane Organics (as methane)	1.91	1.73	1.0

Table 6-1 (Continued) Ambient Air Sampling Laboratory Summary

Bradley Landfill & Recycling Center (BLRC) November 4, 2004

Compound	Sample Ambient Air AA-3 Results (ppbV)	Sample Ambient Air AA-4 Results (ppbV)	Reporting Limit (ppbV)
Hydrogen Sulfide	<50	<50	50
Benzene	0.19	0.18	1.6
Benzyl Chloride	< 0.4	<0.4	0.97
Carbon Tetrachloride	0.12	0.12	0.8
Chlorobenzene	<0.1	<0.1	1.1
Chloroform	<0.1	<0.1	1.0
1,1-Dichloroethane	<0.1	<0.1	1.2
1,1-Dichloroethylene	<0.1	<0.1	1.3
1,2-Dibromoethane	<0.1	<0.1	0.65
Dichlorobenzene ⁽¹⁾	<1.1	<1.1	0.83
Dichloromethane	<0.1	0.12	< 0.1
1,2-Dichloroethane	<0.1	<0.1	1.2
1,1,1-Trichloroethane	<0.1	<0.1	0.92
Perchloroethene	<0.1	<0.1	< 0.1
Toluene	0.92	0.91	1.3
Total Xylenes*	0.61	0.61	1.2
Trichloroethene	<0.1	<0.1	0.93
Vinyl Chloride	<0.1	<0.1	2.0

SCAQMD Rule 1150.1 Components Analysis in Ambient Air Tedlar Bag Samples

Compound	Sample Ambient Air AA-3 Results (ppbV)	Sample Ambient Air AA-4 Results (ppbV)	Reporting Limit (ppbV)
Methane	1.90	2.53	0.5
Total Non-Methane Organics (as methane)	1.30	1.57	1.0

Table 5-3 **Quarterly H2S Monitoring Results**Bradley Landfill, Sun Valley, California

		1	Compressor			
Date	Time	Temp	(Sales Gas)	Flare 1	Flare 2	Flare 3
10/1/2004	10:50	68	48	Tiare i	TialC Z	Tiale 5
10/1/2004	*	*	*			
10/3/2004	*	*	*			
10/4/2004	7:20	59	50			
10/5/2004	9:10	58	55			
10/6/2004	10:30	59	55			
10/7/2004	8:45	54	52			
10/8/2004	12:30	96	55			
10/9/2004	*	*	*			
10/10/2004	*	*	*			
10/11/2004	13:15	74	57			
10/12/2004	12:00	86	50			
10/13/2004	11:10	71	48			
10/14/2004	11:39	86	60			
10/15/2004	12:15	79	52			
10/16/2004	*	*	*			
10/17/2004	*	*	*			
10/18/2004	13:40	55	52			
10/19/2004	9:55	54	50			
10/20/2004	11:00	53	53			
10/21/2004	11:15	60	60			
10/22/2004	3:46	46	62			
10/23/2004	*	*	*			
10/24/2004	*	*	*			
10/25/2004	13:45	66	45			
10/26/2004	8:45	52	42			
10/27/2004	16:45	48	40/41.9 Lab	49.2 Lab	41.3 Lab	16.0 Lab
10/28/2004	9:45	45	45	40.2 Lub	41.0 Lub	10.0 Lub
10/29/2004	8:00	54	42			
10/29/2004	*	*	*			
10/30/2004	*	*	*			
11/1/2004	15:00	61	45			
11/2/2004	07:45	63	43			
11/3/2004	8:15	60	42			
11/4/2004	11:45	61	40			
11/5/2004	11:15	60	42			
11/6/2004	*	*	*			
11/7/2004	*	*	*			
11/8/2004	13:30	61	42			
11/9/2004	8:15	61	48			
11/10/2004	10:30	60	40			
11/11/2004	9:30	61	76			
11/12/2004	14:30	62	42			
11/13/2004	*	*	*			
11/14/2004	*	*	*			
11/15/2004	14:00	73	42			
11/16/2004	13:30	71	40			
11/17/2004	14:45	73	42			
11/18/2004	12:49	69	40			
11/19/2004	12:45	67	40			
11/10/2004	12.70	07	-70			

Table 5-3 **Quarterly H2S Monitoring Results**Bradley Landfill, Sun Valley, California

			Compressor			
Date	Time	Temp	(Sales Gas)	Flare 1	Flare 2	Flare 3
11/20/2004	*	*	*			
11/21/2004	*	*	*			
11/22/2004	11:55	56	50			
11/23/2004	7:35	*	42			
11/24/2004	11:15	58	45			
11/25/2004	*	*	*			
11/26/2004	*	*	*			
11/27/2004	*	*	*			
11/28/2004	*	*	*			
11/29/2004	10:55	50	40/48.1 (Lab)	35.8	31.3	13.8
11/30/2004	7:50	41	42			
12/1/2004	07:05	48	50			
12/2/2004	08:10	40	48			
12/3/2004	8:20	44	42			
12/4/2004	*	*	*			
12/5/2004	*	*	*			
12/6/2004	8:15	45	50			
12/7/2004	8:00	44	52			
12/8/2004	10:15	47	60			
12/9/2004	7:15	46	48			
12/10/2004	5:45	44				
12/11/2004						
12/12/2004						
12/13/2004	Compress	sor shutdown	for repairs			
12/14/2004						
12/15/2004						
12/16/2004	13:41	70				
12/17/2004	7:30	44				
12/18/2004	*	*	*			
12/19/2004	*	*	*			
12/20/2004	7:30	48				
12/21/2004	8:00	44				
12/22/2004	11:15	48	45/Lab 53.2	41.2	37.5	9.8
12/23/2004	7:35	46	50			
12/24/2004	*	*	*			
12/25/2004	*	*	*			
12/26/2004	*	*	*			
12/27/2004	7:44	42	35			
12/28/2004	8:50	38	38			
12/29/2004	9:00	46				
12/30/2004		sor shutdown				

^{*} Data not collected on weekends and holidays

TABLE 3-3 LFG Well Data for "B" and "C" Monitoring Grids Fourth Quarter 2004

Bradley Landfill, Sun Valley, California

						Current	Adjusted	Current					
	Date/Time	CH4	CO2	02	Balance	Static	Static	Differential	Current	Adjusted	Current		
Device ID	mm/dd/yy	(%)	(%)	(%)	(%)	Pressure	Pressure	Pressure	Flow	Flow	Temperature	Comments	Grid Type
BR000001	11/2/2004 10:45	29.1	27.9	1	42	-21.7	-18.4	21.326	68	62	139	Min Flow	C
BR000001	12/7/2004 9:01	38	34.7	0	27.3	-0.4	-10.9	0.902	15		52	1/4 Open	С
BR000002	10/6/2004 10:44	26.4	27.7	0	45.9	-2.2	-1	-3.327			120	Min Flow	С
BR000002	11/2/2004 10:53	27.6	29.6	1.1	41.7	-0.8	-0.7	10.978	50	39	115	Min Flow	С
BR000002	12/7/2004 8:41	36.9	34.2	0	28.9	-4.8	-0.8	3.611	30		49	1/4 Open	С
BR000003	10/6/2004 11:09	0.6	3.8	12.6	83	-0.1	-0.8	-0.84			110	Disconnected	С
BR000003	11/31/04											Disconnected	С
BR000003	12/31/2004 0:00											Disconnected	С
BR000004	10/6/2004 11:21	16.6	18.5	0.7	64.2	-9.8	-0.3	5.917	36		118	Min Flow	С
BR000004	11/2/2004 11:14	23	21.6	1	54.4	-7.1	-0.8	17.785	63	58	117	Min Flow	С
BR000004	12/7/2004 9:49	26.9	26.1	0	47	-1	-0.9	1.898	21	7	53	1/4 Open	С
BR000005	10/31/2004 0:00											Disconnected	С
BR000005	11/2/2004 11:24	2.9	11.1	3.4	82.6	-1.3	-1.2	18.975	8	1	95	Min Flow	С
BR000005	12/7/2004 9:30	2.5	11.8	2.5	83.2	-6.1	-1.7	5.998	4	4	56	Min Flow	С
BR000006	10/6/2004 11:37	12.1	20	0.9	67	-2.2	-2.2	3.619	28		106	Min flow	С
BR000006	11/2/2004 11:29	16.3	22.5	1.2	60	-1.1	-0.6	16.585	61	44	117	Min Flow	С
BR000006	12/7/2004 9:23	10.5	4.2	0	85.3	-0.5	-0.5	1.573	20		60	Min Flow	С
BR000007	10/13/2004 10:08	13.6	24.9	0	61.5	-0.5	-0.5	0.123	43	5	100	Min Flow	С
BR000007	11/8/2004 11:51	11.1	22.3	0.8	65.8	-1.8	-2.4	-0.523		7		Min Flow	С
BR000007	12/7/2004 11:12	13.4	23.8	0.9	61.9	-1.5	-1.4	1.835	20	12		Min Flow	С
BR000008	10/13/2004 10:03	9.9	18.5	5.3	66.3	-2	-2	0.006	7	2		Min Flow	С
BR000008	11/8/2004 11:47	7.3	17.5	5.4	69.8	-9.3	-10.6	0.092	4	4		Min Flow	С
BR000008	12/7/2004 11:16	6.9	16.5	5.6	71	-6.9	-6.9	1.331	17	7		Min Flow	С
	10/13/2004 11:04	22.7	28.8	0	48.5	-12.4	-12.4	11.308	566	42		1/4 Open	С
	11/22/2004 8:25	32.9	31.3	0	35.8	-6	-5.9	0.479	8	8		Min Flow	С
BR000009	12/6/2004 12:00	32.7	33.2	0	34.1	-4.5	-4.6	8.522	37	32	57	1/4 open	С
BR000010	10/11/2004 14:27	39.4	35.7	0	24.9	-23.9	-23.6	23.63	0	0	135	1/2 Open	С
BR000010	11/19/2004 11:31	44.8	36.2	0	19	-20.2	-20.8	25.663	0	0	73	3/4 Open	С
	12/6/2004 11:51	45.1	37.7	0	17.2	-16.5	-16.6	14.613	0	0	57	3/4 Open	С
	10/31/2004 0:00											Disconnected	С
BR000011	11/8/2004 11:35	21.1	18.6	10.5	49.8	-21.9	-22	23.69	59	4	130	Full Open	С

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TABLE 3-3 LFG Well Data for "B" and "C" Monitoring Grids Fourth Quarter 2004

Bradley Landfill, Sun Valley, California

						Current	Adjusted	Current					
	Date/Time	CH4	CO2	02	Balance	Static	Static	Differential	Current	Adjusted	Current		
Device ID	mm/dd/yy	(%)	(%)	(%)	(%)	Pressure	Pressure	Pressure	Flow	Flow	Temperature	Comments	Grid Type
BR000011	12/6/2004 11:24	28.5	23.8	8.2	39.5	-15.9	-15.8	12.571	45	40	54	Full Open	C
BR000014	10/31/2004 0:00											Disconnected	С
BR000014	11/2/2004 11:04	15.1	21	6.9	57	-4	-0.7	4.162	30	30	123	Min Flow	С
BR000014	12/7/2004 9:08	17.9	24.5	0	57.6	-0.7	-1.1	0.45	10		53	Min Flow	С
BR000015	10/31/2004 0:00											Disconnected	С
BR000015	11/2/2004 11:10	13.6	17.1	0.4	68.9	-1	-1.2	6.082	0		95	Min Flow	С
BR000015	12/7/2004 9:15	16.3	20.5	0	63.2	-1.4	-1.3	1.867	0		52	Min Flow	С
BR000016	10/7/2004 14:35	31.8	29.3	0.2	38.7	-11	-15.4	6.402	31	45	96	Min Flow	С
BR000016	11/22/2004 8:34	31.7	28.4	0	39.9	-8.6	-9.1	0.247	6	5	105	Min Flow	С
BR000016	12/7/2004 10:47	33.6	30.5	0	35.9	-8.2	-8.2	7.845	36	33	51	1/4 Open	С
BR000017	10/31/2004 0:00											Disconnected	С
BR000017	11/22/2004 8:42	21.1	25.2	0	53.7	-1.1	-1.1	0.01	1	1	103	Min Flow	С
BR000017	12/7/2004 10:58	24.8	28.6	0	46.6	-11.3	-9.9	-7.465			105	1/4 Open	С
BR000018	10/31/2004 0:00											Disconnected	С
BR000018	11/2/2004 11:20	19	17.7	0.8	62.5	-18.4	-18.3	3.845	0			Min Flow	С
BR000018	12/7/2004 9:44	22.2	22.3	0	55.5	-16.8	-16.7	15.439	0	0	53	1/4 Open	С
BR000019	10/6/2004 10:58	49.8	35.2	0.6	14.4	-11.7	-12.9	0.524	11	12	112	3/4 Open	С
BR000019	11/22/2004 8:53	44.8	34.6	0	20.6	-13	-12.2	3.513	31	30	0	3/4 Open	С
BR000019	12/7/2004 10:04	41.4	35.6	0	23	-10	-12.4	-1.872			72	3/4 Open	С
BR000020	10/12/2004 14:59	28.4	26.9	0.3	44.4	-6.6	-7	1.733	19	20	120	1/4 Open	С
BR000020	11/22/2004 9:00	28.1	26	0.5	45.4	-2.5	-2.6	0.038	2	3	121	Min Flow	С
BR000020	12/7/2004 10:13	44	32.9	0.4	22.7	-2	-1.8	0.894	15	4	53	1/4 Open	С
BR000021	10/13/2004 14:13	29.0	28	0.1	42.9	-1.1	-1.1	0.794	239	8		Min Flow	С
BR000021	11/22/2004 9:09	26.3	24.9	1.5	47.3	-1.5	-1.4	0.06	3	4	121	Min Flow	С
BR000021	12/7/2004 10:19	32.5	27	1.4	39.1	-1.4	-1.1	2.249	23		53	1/4 Open	С
BR000022	10/13/2004 10:13	33.9	29.3	3	33.8	-17.3	-17.3	7.701	709	21	100	1/4 Open	С
BR000022	11/22/2004 9:17	35.5	29.3	3.2	32	-14	-19.3	2.617	20	19	100	1/4 Open	С
BR000022	12/9/2004 15:04	34.5	35.7	0	29.8	-18.5	-18.5	4.209	27	27	0	Min Flow	С
BR000025	10/11/2004 14:29	57.9	41.6	0.2	0.3	-0.6	-0.5	0.943	0	0	0	Full Open	С
BR000025	11/19/2004 14:51	55	42	0.4	2.6	-35.8	-35.4	0.506	0	0	0	Full Open	С
BR000025	12/6/2004 11:17	58.3	41.6	0	0.1	0	0.6	2.787	0	0	54	3/4 Open	С

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TABLE 3-3 LFG Well Data for "B" and "C" Monitoring Grids Fourth Quarter 2004

Bradley Landfill, Sun Valley, California

						Current	Adjusted	Current					
	Date/Time	CH4	CO2	02	Balance	Static	Static	Differential	Current	Adjusted	Current		
Device ID	mm/dd/yy	(%)	(%)	(%)	(%)	Pressure	Pressure	Pressure	Flow	Flow	Temperature	Comments	Grid Type
BR000026	10/13/2004 10:45	43.2	36.5	0	20.3	-23.4	-23.4	21.567	0	0	120	3/4 Open	C
BR000026	11/22/2004 9:23	45.3	36.1	0	18.6	-22.7	-22.2	21.207	0	0	119	Full Open	С
BR000026	12/7/2004 11:23	46	37.2	0	16.8	-16.3	-15.5	13.725	0	0	52	Full Open	С
BR000027	10/13/2004 10:43	25.2	30.1	1.4	43.3	-11.3	-11.3	1.289	257	21	132	Min Flow	С
BR000027	11/19/2004 11:46	31	30.1	0	38.9	-5.3	-5.2	7.02	41	24	69	Min Flow	С
BR000027	12/6/2004 13:03	0	8.0	20	79.2	0	0	-2.003			0	1/4 Open	С
BR000028	10/11/2004 11:47	25.3	28.3	0	46.4	-4.9	-4.6	4.774	0	0	0	Min Flow	С
BR000028	11/22/2004 10:00	33.8	29.1	0	37.1	-3.9	-4	4.052	0	0	0	Min Flow	С
BR000028	12/6/2004 11:40	33.8	31.8	0	34.4	-5.1	-4.9	3.481	0	0	53	1/4 Open	С
BR000029	10/31/2004											Disconnected	С
BR000029	11/31/04											Disconnected	С
BR000029	12/21/2004											Disconnected	С
BR000031	10/21/2004 0:00											Disconnected	С
BR000031	11/19/2004 11:07	14.6	23.2	0	62.2	0	-0.4	6.735	39	8	73	Min Flow	С
BR000031	12/7/2004 8:30	1.4	20.5	0	78.1	-0.8	-0.7	2.609	24		55	Min Flow	С
BR000033	10/31/2004 0:00											Disconnected	В
BR000033	11/19/2004 10:20	45.9	35.7	0	18.4	0	-0.1	4.805	34	5	71	1/4 Open	В
BR000033	12/6/2004 9:55	16.2	26.4	0	57.4	-2.5	-12.4	-9.145		4	66	1/2 Open	В
BR000034	10/11/2004 9:53	7.5	21.7	0	70.8	-0.2	-0.2	0.01	1	2	132	Min Flow	В
BR000034	11/19/2004 9:20	12.8	23.8	0	63.4	0	0	2.94	26		71	Min Flow	В
BR000034	12/6/2004 9:48	8.7	22.9	0	68.4	-3	-12.5	-11.502		9	79	1/4 Open	В
BR000036	10/11/2004 9:31	3.4	18.2	1.7	76.7	-8.9	-0.8	6.368	37	8	130	Min flow	В
BR000036	11/19/2004 8:48	7.4	19.4	1.1	72.1	-0.3	0	3.354	27		79	Min Flow	В
BR000036	12/7/2004 11:42	4.4	19.3	1.3	75	-2.5	-10.3	-7.872			75	1/2 Open	В
BR000039	10/11/2004 9:46	9.3	21.5	1.8	67.4	-2	-2	1.125	15	15	120	Min flow	В
	11/19/2004 15:40	11.3	20.5	1	67.2	-3	-13.2	-0.687		48	0	1/2 Open	В
BR000039	12/2/2004 11:07	11.3	21.2	0.7	66.8	-3.2	-16.7	-5.66		51	78	1/2 Open	В

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Table 3-1 **Integrated Surface Sampling, Field Summary**

Bradley Landfill and Recycling Center Sun Valley, California

DATE OF SAMPLING: October 19th and 20th, 2004 TECHNICIAN: RES Environmental Inc. INSTRUMENT OVA 128/88

88-ISS Packs

Grid I.D.	TOC CONCENTRATION	Sample	ACTION TAKEN	DATE OF	DATE OF ANY REQUIRED RE-	RE-MONITORED CONCENTRATION
	(ppmv)	Date	TO REPAIR LEAK	REPAIR	MONITORING	(ppmv)
1	0	10/25/2004	NA			
2	0	10/25/2004	NA			
3	0	10/25/2004	NA			
4	0	10/26/2004	NA			
5	0	10/26/2004	NA			
6	1	10/26/2004	NA			
7	1	10/26/2004	NA			
8	0	10/26/2004	NA			
9	0	10/26/2004	NA			
10	0	10/26/2004	NA			
11	0	10/26/2004	NA			
12	0	10/26/2004	NA			
13	0	10/26/2004	NA			
14	0	10/26/2004	NA			
15	0	10/26/2004	NA			
16	0	10/26/2004	NA			
17	0	10/26/2004	NA			
18	0	10/26/2004	NA			
19	0	10/26/2004	NA			
25	1	10/26/2004	NA			
26	0	10/26/2004	NA			
27	0	10/26/2004	NA			
28	0	10/26/2004	NA			
29	0	10/26/2004	NA			
30	0	10/26/2004	NA			
31	1	10/26/2004	NA			
32	0	10/25/2004	NA			
33	1	10/25/2004	NA			
34	0	10/25/2004	NA			
35	1	10/25/2004	NA			
36	0	10/25/2004	NA			
38	0	10/25/2004	NA			
40	0	10/26/2004	NA			
41	0	10/26/2004	NA			
42	1	10/26/2004	NA			
43	0	10/25/2004	NA			
44	0	10/25/2004	NA			
45	0	10/26/2004	NA NA			
46	0	10/25/2004	NA NA			
47	0	10/26/2004	NA NA			
48	0	10/25/2004	NA NA			
49	1	10/26/2004	NA NA			
50	0	10/25/2004	NA NA			
51	0	10/25/2004	NA NA			
52	1	10/26/2004	NA NA			
53	1	10/25/2004	NA NA			
<u>54</u>	0	10/25/2004	NA NA			
55 56	0	10/26/2004	NA NA			
56 57	0	10/26/2004	NA NA			
	+	10/25/2004	NA NA			
58	1	10/25/2004	NA NA			
59 60	0	10/25/2004 10/26/2004	NA NA			
	0		NA NA			
61	0	10/25/2004	NA NA			
62	0	10/26/2004	NA		1	

Table 3-1 **Integrated Surface Sampling, Field Summary**

Bradley Landfill and Recycling Center Sun Valley, California

DATE OF SAMPLING: October 19th and 20th, 2004 TECHNICIAN: RES Environmental Inc. INSTRUMENT OVA 128/88

88-ISS Packs

Grid	1.0.		Sample	ACTION TAKEN	DATE OF	REQUIRED RE-	CONCENTRATION
		CONCENTRATION (ppmv)	Date	TO REPAIR LEAK	REPAIR	MONITORING	(ppmv)
6	3	0	10/26/2004	NA			
6	4	0	10/25/2004	NA			
6	5	0	10/25/2004	NA			
6	6	0	10/25/2004	NA			
6	7	0	10/25/2004	NA			
6	8	0	10/25/2004	NA			
6	9	0	10/26/2004	NA			
7	0	0	10/26/2004	NA			
7	1	0	10/25/2004	NA			
7	2	1	10/25/2004	NA			
7	3	0	10/25/2004	NA			
7	4	0	10/26/2004	NA			
7	5	1	10/26/2004	NA			
7	6	0	10/26/2004	NA			
7	7	0	10/26/2004	NA			
7		0	10/26/2004	NA			
7	9	0	10/25/2004	NA			
8		0	10/25/2004	NA			
8		0	10/25/2004	NA			
8		0	10/25/2004	NA			
8		1	10/25/2004	NA			
8		0	10/25/2004	NA			
8		0	10/25/2004	NA NA			
8		0	10/25/2004	NA			
8		0	10/25/2004	NA NA			
8		0	10/25/2004	NA NA			
8		0	10/25/2004	NA NA			
9		0	10/25/2004	NA NA			
9		0	10/26/2004	NA NA			
9		0	10/26/2004	NA NA			
9		0	10/26/2004	NA NA			
9		0	10/25/2004	NA NA			
9		1	10/25/2004	NA NA			
9		1	10/25/2004	NA NA			
9		0	10/25/2004	NA NA			
9		2	10/25/2004	NA NA			
9		0	10/25/2004	NA NA			
10		0		NA NA			
			10/26/2004				
10		0	10/25/2004	NA NA			
10		0	10/25/2004	NA NA			
		0	10/25/2004				
10		0	10/25/2004	NA NA			
10		0	10/25/2004	NA NA			
10		1	10/25/2004	NA NA			
10		3	10/26/2004	NA NA			1
10		3	10/26/2004	NA NA			
10		1	10/25/2004	NA NA			
	0	0	10/25/2004	NA NA			1
11		0	10/25/2004	NA			
11		0	10/25/2004	NA			
11		0	10/25/2004	NA			
11		0	10/25/2004	NA			
11		0	10/25/2004	NA			
	8	0	10/26/2004	NA			
11	9	0	10/26/2004	NA			

Table 3-1 Integrated Surface Sampling, Field Summary

Bradley Landfill and Recycling Center Sun Valley, California

INSTRUMENT OVA 128/88 DATE OF SAMPLING: October 19th and 20th, 2004

88-ISS Packs TECHNICIAN: RES Environmental Inc.

Grid I.D.	TOC CONCENTRATION (ppmv)	Sample Date	ACTION TAKEN TO REPAIR LEAK	DATE OF REPAIR	DATE OF ANY REQUIRED RE- MONITORING	RE-MONITORED CONCENTRATION (ppmv)
120	0	10/26/2004	NA			
121	0	10/26/2004	NA			
122	0	10/26/2004	NA			
123	1	10/26/2004	NA			
124	0	10/26/2004	NA			
125	0	10/26/2004	NA			
126	0	10/26/2004	NA			
127	0	10/26/2004	NA			
128	1	10/26/2004	NA			
129	0	10/26/2004	NA			
130	0	10/26/2004	NA			
131	0	10/26/2004	NA			
132	0	10/26/2004	NA			
Active Dumping Areas						
20	N/A	10/26/2004	N/A			
21	N/A	10/26/2004	N/A			
22	N/A	10/26/2004	N/A			
23	N/A	10/26/2004	N/A			
37	N/A	10/26/2004	N/A			
39	N/A	10/26/2004	N/A			
24	N/A	10/26/2004	N/A			

^{* =} Additional 10-liter Tedlar bag samples from Grids 111 and 112 were sent to the lab for further analysis.

TOC Concentrations are detections above the background of 5 ppm